

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

THE EDGAR ASSOCIATION,

*Plaintiff,*

v.

HAMMOND SOFTWARE, INC.  
and NICOLAS HAMMOND,

*Defendants.*

Case No. 1:23-cv-04985-VMC

**JURY TRIAL DEMANDED**

HAMMOND SOFTWARE, INC.,

*Counterclaim-Plaintiff*

v.

THE EDGAR ASSOCIATION, THE  
AMERICAN CONTRACT BRIDGE  
LEAGUE, INC., BRIAN PLATNICK,  
FRANCO BASEGGIO, and A.J.  
STEPHANI,

*Counterclaim-Defendants.*

**JOINT MOTION TO STAY PENDING RESOLUTION OF  
THE EDGAR ASSOCIATION'S MOTION TO DISMISS HAMMOND'S  
INFRINGEMENT CLAIMS OF U.S. PATENT NO. 11,439,912 AND  
MOTION FOR JUDGMENT ON THE PLEADINGS ON U.S. PATENT NO.  
11,014,005 FOR LACK OF PATENT ELIGIBILITY UNDER 35 U.S.C. § 101**

Plaintiff and Counterclaim-Defendant The Edgar Association (“EDGAR”), Counterclaim-Defendants The American Contract Bridge League, Inc. (“ACBL”), Brian Platnick, Franco Baseggio, and A.J. Stephani, Defendant and Counterclaim-Plaintiff Hammond Software, Inc., and Defendant Nicholas Hammond (collectively, the “Parties”), jointly move the Court to stay all discovery and pretrial deadlines in the above-captioned litigation until resolution of EDGAR’s pending Motion to Dismiss Hammond’s Infringement Claims of U.S. Patent No. 11,439,912 and Motion for Judgment on the Pleadings on U.S. Patent No. 11,014,005 for Lack of Patent Eligibility Under 35 U.S.C. § 101 (ECF No. 52) (the “101 Motion”), except the deadlines for the Defendants to file their opposition and for the Plaintiff to file its reply.

The Parties agree that staying the case to allow the Court time to resolve EDGAR’s potentially dispositive § 101 Motion would conserve the Court’s resources, and the Parties’ resources, promote judicial efficiency, and avoid unnecessary expenses and motion practice. The non-moving parties have agreed to be bound by the result of the Court’s order on EDGAR’s 101 Motion to the same extent as EDGAR.

Accordingly, the Parties respectfully request the Court grant this joint motion to stay.

Dated: May 14, 2024

Respectfully submitted,

/s/Seth K. Trimble

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HAMMOND SOFTWARE, INC., AND  
NICOLAS HAMMOND**

/s/ Noah C. Graubart

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**ATTORNEYS FOR PLAINTIFF  
THE EDGAR ASSOCIATION**

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Noah C. Graubart

Noah C. Graubart

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list.

Date: May 14, 2024

/s/ Noah C. Graubart

Noah C. Graubart